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June 9, 2025

VIA ECF

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

So ordered
6-10-25
Alvin K. Hellerstein

Re: *Kashef v. BNP Paribas S.A.*, No. 16-cv-3228 (AKH)(JW)

Dear Judge Hellerstein:

This firm and Gibson, Dunn & Crutcher LLP represent Defendants BNP Paribas S.A. and BNP Paribas U.S Wholesale Holdings, Corp. (together "Defendants") in the above-referenced action. Pursuant to Rule 4.B of the Court's Individual Rules, we write to request leave to file on the public docket redacted versions of certain of the expert reports and expert reply reports filed in connection with Defendants' Memorandum of Law in Support of Their Motion to Exclude Testimony in Whole or in Part by Plaintiffs' Experts ("Defendants MOL"), as referenced in the Declaration of Charity E. Lee in Support of Defendants' MOL, and to file unredacted versions of those exhibits under seal.

The redactions applied to these materials, listed in Appendix A, are consistent with the parties' prior agreement reflected in their joint letter to the Court, *see* ECF No. 500, and Your Honor's subsequent Order authorizing the parties to apply "narrowly tailored redactions . . . to individuals' names and other personal information and certain transaction information not at issue in this action," ECF No. 504. As shown in Appendix A, almost all of the exhibits that Defendants now seek to file publicly with redactions have previously been filed with redactions

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pursuant to the parties' agreement and the Court's approval. The one additional document which Defendants seek to file publicly with redactions is an expert reply report, which Defendants will redact consistent with the approach used for the other similar exhibits. Plaintiffs have consented to the redaction of this additional document.

Respectfully submitted,

/s/ Carmine D. Boccuzzi, Jr.
Carmine D. Boccuzzi, Jr.

CC: Counsel of Record

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Appendix A

Document	Prior ECF ¹
Baldo Expert Report	528-54
Baldo Reply Report	528-55
Fogarty Expert Report	528-63
Fogarty Reply Report	528-64
Hudson Expert Report	528-68
Hudson Reply Report	528-69
Jok Expert Report	527-6
Keller & Rosenfeld Expert Report	527-8
Keller & Rosenfeld Reply Report	---
Koch Expert Report	528-83
Koch Reply Report	527-7
Verhoeven Expert Report	528-93
Verhoeven Reply Report	528-94

¹ Although the parties have previously filed certain of these exhibits on multiple occasions, Defendants list only one prior ECF per document, for ease of reference.